

SheppardMullin

Sheppard, Mullin, Richter & Hampton LLP
30 Rockefeller Plaza
New York, New York 10112-0015
212.653.8700 main
212.653.8701 fax
www.sheppardmullin.com

USDC SDNY
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212.286.0611 direct
mgilbert@sheppardmullin.com

May 29, 2024

MEMO ENDORSED

The Honorable Valerie E. Caproni
United States District Court Judge for the Southern District of New York
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

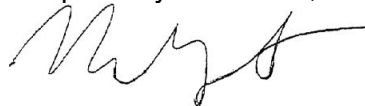
Re: *United States v. Donte Goulbourne* et al, 23-cr-00544 (S.D.N.Y.)

Dear Judge Caproni:

On behalf of Donte Goulbourne, a defendant in the above-captioned case, we respectfully request that his Pretrial Services Officer, Laura Gialanella, be given the authority to adjust Mr. Goulbourne's curfew to allow him to attend his new job at the Chelsea House. Attached as Exhibit A is an employment verification letter from the Chelsea House, and attached as Exhibit B is his work schedule for this week (the week of May 28, 2024). The Court previously set Mr. Goulbourne's curfew to begin at 11 P.M. and end at 11 A.M. in an Order dated March 13, 2024 (ECF No. 56).

We requested consent from Pretrial Services and the Government. Pretrial Services has consented to this request on the condition that Mr. Goulbourne provide Pretrial Services with his schedule in advance each week, and AUSA Dang stated that the "Government defers to Pretrial."

Respectfully Submitted,



Michael J. Gilbert
for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

cc: Connie Dang, Assistant U.S. Attorney
Laura Gialanella, U.S. Pretrial Services Officer

Application GRANTED. Mr. Goulbourne's curfew is modified to allow him to attend his new job at the Chelsea house. He must provide his work schedule to Pretrial Services in advance each week, and his curfew is only modified on the days on which he has a pre-scheduled shift.

SO ORDERED.



5/29/2024

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE